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Office of Enforcement, Compliance and Environmental Justice

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May 14, 2019

Jim Semerad North Dakota Department of Environmental Quality Division of Air Quality 918 E Divide, 2nd Floor Bismarck, ND 58501-1947

LIGNITE GAS PLANT

PERMIT T5-O80001; RENEWAL DATED APRIL 4, 2012; RENEWAL PERMIT ISSUED 1/12/2017 FINAL NSPS SUBPARTS KKK, OOOO, and OOOOa SEMIANNUAL MONITORING REPORT

Dear Mr. Semerad:

ONEOK Rockies Midstream, L.L.C. (ORM) respectfully submits the attached final New Source Performance Standards (NSPS) Leak Detection and Repair (LDAR) Subparts KKK, OOOO, and OOOOa Semiannual Monitoring Report for the Lignite Gas Plant located in Burke County, North Dakota.

This report is submitted to EPA Region 8 per 40 CFR Subpart OOOO and Standard Condition 3C of the above referenced permit for monitoring conducted during the period of January 1, 2019 through February 28, 2019.

Please note that ownership of the Lignite Gas Plant was transferred from ORM to another party effective March 1, 2019. ORM notified NDDEQ of the transfer in a letter dated March 25, 2019.

If you have any questions, please call Kim Rudningen at (406) 478-9636 or me at (918) 591-5009.

Sincerely,

(b) (6)

W. Parke Moore

Corporate LDAR Program Manager

Attachments: NSPS KKK, OOOO, and OOOOa Final LDAR Monitoring Report for Lignite Plant

cc: Director; Air and Toxics Technical Enforcement Program

Office of Enforcement, Compliance and Environmental Justice

USEPA Region VIII

1595 Wynkoop Street, Mail Code 8ENF-AT

Denver, CO 80202-1129

CERTIFIED MAIL 7015 3010 0001 0420 4457, RETURN RECEIPT REQUESTED

K. Rudningen / T. Merrill / A. Hernandez / J. Handeland / D. Roensch / R. Brown (.pdf)

Tulsa Environmental Files - Lignite GP - ND\2.0 Air Files\2.3 Compliance Reporting\SAR\LDAR SAR\2019-5\SUBMITTAL

ONEOK Rockies Migstream 100 West Fifth Street Tulsa: OK 74103 www.check.com

CERTIFICATION

FOR

NSPS SUBPARTS KKK, OOOO, AND OOOOa

FINAL LDAR MONITORING REPORT

JANUARY 1, 2019 through FEBRUARY 28, 2019

Facility Name: Lignite Gas Plant

Facility Permit No.: PERMIT T5-080001; RENEWAL DATED APRIL 4, 2012; RENEWAL

PERMIT ISSUED 1/12/2017

Facility Location: Sec. 7, T192N, R91W, Burke County, ND

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Name of Responsible Official (print or type): David C. Roensch

Title: <u>Vice President – NGGP Operations</u>

ONEOK Rockies Midstream, L.L.C. Lignite Gas Plant

NSPS SUBPARTS KKK, OOOO, AND OOOOa
FINAL LDAR MONITORING REPORT
JANUARY 1, 2019 through FEBRUARY 28, 2019



April 12, 2019

Ms. Teresa Merrill Environmental Specialist ONEOK Rockies Midstream 896 25th Street SE Sidney, MT 59270

RE: Semiannual Leak Detection and Repair (LDAR) Monitoring Report, Lignite Natural Gas Processing Facility, Burke County, North Dakota

Dear Ms. Merrill:

During January 1. 2019 through February 28, 2019, Trihydro Corporation (Trihydro) completed routine monthly monitoring for fugitive emissions as required by the LDAR program at the ONEOK Rockies Midstream Lignite (Lignite) natural gas processing facility located in Burke County, North Dakota. Monitoring activities were completed to satisfy the requirements of the New Source Performance Standard (NSPS) Subpart KKK, Subpart OOOO, and Subpart OOOOa regulations. This report serves as the documentation required for submittal to the regulatory agencies for the January through February 2019 monitoring period.

NSPS Subpart KKK, OOOO, and OOOOa Requirements

Subparts KKK. OOOO, and OOOOa require that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, pressure relief devices (PRDs), pumps, compressors, and connectors (OOOO and OOOOa) for which leaks were detected.
- The number of valves, PRDs, pumps, compressors, and connectors (OOOO and OOOOa) for which leaks were not repaired as required or placed on the delay of repair (DOR) list.
- The facility is required to report the reasons for each DOR and the dates of process unit shutdowns that occurred within the reporting period.
- Revisions to the component inventory.

Results

The Lignite facility consists of two process units subject to the Subpart KKK regulation, one process unit subject to the Subpart OOOO regulation, and one process unit subject to the Subpart OOOO regulation.



Ms. Teresa Merrill April 12, 2019 Page 2

Trihydro personnel monitored components in volatile organic compound service and wet gas service in accordance with the United States Environmental Protection Agency Method 21 protocol.

During the January 1, 2019 through February 28, 2019 reporting period, 4 leaks were detected from components monitored as required by Subpart KKK and Subpart OOOO regulations. There were 6 leaks detected from components monitored as required by the Subpart OOOOa regulation. Initial repairs were completed on each component identified as leaking and 10 received passing Method 21 inspections within the 15-day deadline. The number of valves, PRDs, pumps, compressors, and connectors for which leaks were detected during the reporting period are presented in Attachments A and B.

There were no components added to and no components deleted from Subpart KKK. Subpart OOOO, and Subpart OOOOa process unit inventories during the reporting period. Revisions to the component inventory are reported in Attachment A.

No process unit shutdowns meeting the definition of §60.481 were reported by the facility during the reporting period.

As of March 1st, 2019, the Lignite facility will be operating under a new ownership. Therefore, this will be the final semiannual report submitted for the Lignite facility by ONEOK Rockies Midstream.

If you have any questions or comments, please contact Kyle Haag at khaag@trihydro.com or Jeremy Sell at isell@trihydro.com or by calling us at (701) 204-0065.

Sincerely, Trihydro Corporation

(b) (6)

Kyle Haag Project Manager

07M-041-003

Attachments

(b) (6)

Jeremy Sell Business Unit Manager - LDAR Services

- 1 1 1 FFF 1

ATTACHMENT A

EQUIPMENT LEAK REPORT,
DELAY OF REPAIR COMPONENTS, AND
REVISIONS TO THE PRIOR INVENTORY



From: 1/1/2019 To: 2/28/2019, Rule: NSPS - KKK

ONEOK - Lignite

Unit:

FLARE

# Components: # Added: # Perm. OOS:	Valve	s: 0 0 0	Pumps: 1 Compressors: 0 0 0 0		Р	RVs: 0 0		
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
January 2019	0	0	0	0	0	0	0	0
February 2019	0	0	0	0	0	0	0	0

Delay of Repairs:		·
	No Delay of Repairs Performed.	
Late Repairs:		
	No Late Repairs	



From: 1/1/2019 To: 2/28/2019, Rule: NSPS - KKK

ONEOK - Lignite

Unit:

REFRIĢERATION

# Components: # Added; # Perm. OOS:	Valve	s: 179 0 0	Pumps	s: 0 0 0	Compres	sors: 0 0 0	PRVs: 2 0 0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking [.]	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
January 2019	2	0	0	0	0	0	0	0
February 2019	0	0	0	0	0	0	0	0

Delay of Repairs:	
	No Delay of Repairs Performed.
Late Repairs:	
	

No Late Repairs.



From: 1/1/2019 To: 2/28/2019, Rule: NSPS - 0000

ONEOK - Lignite

Unit:

Y GRADE STORAGE

Count: # Added: # Perm, OOS:	Valve	s: 91 0 0	Pump	s: 2 0 0	Compres	ssors: 0 0 0	PRV	PRVs: 2 0 0		otors: 341 0 0
Month:	Leaking,	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:						
Jan 2019	0	0	0	0	0	0	0	0	2	0
Feb 2019	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:		
	No Delay of Repairs Performed.	
Late Repairs:		

No Late Repairs.



From: 1/1/2019 To: 2/28/2019, Rule: NSPS - OOOOa

ONEOK - Lignite

Unit:

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Count: # Added: # Perm. OOS:	Valve	s: 293 0 0	Pump	s: 2 0 0	Compres	ssors: 0 0 0	PR√	PRVs: 13 0 0		0 0
Monih:	Leaking:	Not Repaired in Repair Period:								
Jan 2019	2	0	0	0	0	0	4	0	0	0
Feb 2019	0	0	0	0	0	0	0	0	0	0

		
	No Delay of Repairs Performed.	
Late Repairs:		

No Late Repairs.

ATTACHMENT B EPA CDX REPORTING TABLE

An owner or operator must include the information specified in paragraphs (c)(1) and (2) of this section in all semiannual reports in addition to the information required in \$60.487a(c)(2)(i) through (vi): (1) Number of pressure relief devices for which leaks were detected as required in \$60.5401a(b)(2); and (2) Number of pressure relief devices for which leaks were not repaired as required in \$60.5401a(b)(3).

The asterisk [*) next to each field indicates that the corresponding field is required.

QUIPMENT	INFORMATION
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Facility Record No. ** (Select from dropdown n list) Month Identificati on* (Select from dropdown from list)	pressure relief devices for which leaks were detected *	which leaks were not repaired * (660 54224c)(2))	which leaks	leaks were not repaired *	which leaks were detected *	Number of pumps for which leaks were not repaired * (560.487a(c)(2)(Number of connectors for which leaks were detected * (\$60.487a(c)(2)(vi l), \$60.5422a(a))	Number of connectors for which leaks were not repaired * (§60.487a(c)(2)(viil), §60.5422a(a))
	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: \$	e.g.: \$	e.g.• 5	e.g.: 5
1 January 1 February	4	0	2	0	0	0	0	C